IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR MARION COUNTY

ADAM EUGENE KOBS, an individual, and **N.K.,** a minor, by and through his father and natural guardian, ADAM E. KOBS**,**

Plaintiffs,

v.

SILVERTON SHELTERING SERVICES d.b.a. **"SHELTERING SILVERTON,"** an Oregon public-benefit nonprofit corporation; **SARAH WHITE**, individually; **JOSEPH SCHMAUS**, individually; **JORDAN SIMS**, individually; and **TRAVIS DEAN GLIDDEN**, individually,

Defendants,

Case No. 25CV57849

PLAINTIFF'S MOTION FOR SANCTIONS AGAINST GUY KEATING AND SARAH WHITE / SHELTERING SILVERTON; JUDGEMENT ON LIABILITY IN FAVOR OF PLAINTIFF; ADVERSE INFERENCE; REFERRAL FOR PERJURY

MEMORANDUM IN SUPPORT

Plaintiffs move for sanctions under ORCP 17, ORCP 46, and the Court's inherent authority. This motion is necessitated by a coordinated pattern of misconduct: (1) the potential willful spoliation of the most critical evidence; (2) a subsequent campaign of false sworn statements to the Court; and (3) the outright disobedience of this Court's orders. Plaintiffs allege probable cause to refer counsel's sworn statements for investigation of potential criminal perjury under ORS 162.065, committed in an attempt to fraudulently dissolve this Court's order. Plaintiffs acknowledge that Defendants' Motion to Dismiss remains pending; however, the misconduct documented herein occurred during the litigation and, if the case proceeds, demands immediate and severe remedy.

///

I. INTRODUCTION AND OVERVIEW OF MISCONDUCT

This case presents the Court with a rare and disturbing pattern of litigation conduct. On one side, the client---Sheltering Silverton and its Executive Director, Sarah White---failed in its most basic duty to preserve relevant evidence, then compounded that failure by willfully ignoring a direct court order designed to remedy it. On the other side, their hired counsel, Guy Keating, Esq., submitted demonstrably false sworn statements to this Court to dissolve that same preservation order and, when confronted with irrefutable proof of his falsehoods, engaged in a deceptive charade of filing an "amended" declaration that left the lies intact. These are not isolated incidents of negligence. They are interconnected acts of obstruction that, together, represent a fundamental assault on the truth-seeking function of this Court.

Plaintiffs' Litigation Posture: Plaintiffs appear before this Court pro se out of necessity. Mr. Kobs acknowledges that while he is capable of conducting legal research and drafting written submissions, the demands of impromptu oral argument on complex legal and factual issues—particularly the application of case law, the Oregon Rules of Civil Procedure, and UTCR rules in a live hearing—are beyond his current skill set. Therefore, Plaintiffs' intent is for their written submissions to stand as the primary vehicle for their legal arguments. Should the Court press for oral argument on points not squarely addressed in the briefing, Mr. Kobs will respectfully request time to provide a supplemental written response. Furthermore, should this case progress toward trial or other substantive hearings, Plaintiffs intend to seek limited-scope representation from professional counsel specifically for the purpose of oral advocacy.

The destroyed CCTV footage was not merely relevant; it was the *sine qua non* of Plaintiffs' ability to prove their claims. The videos would have shown the jury (not limited to):

- The nightly, graphic, and threatening monologues by Travis Glidden regarding sexual violence regarding a “Son” he allegedly had, and murderous language outbursts.
- The specific, audible death threat against resident Siniva Langloss.
- The violent outbursts and explicit arson threats by Jordan Sims and Glidden.

- The culminating event in August 2024 where both Sims and Glidden physically cornered and challenged Mr. Kobs to a fight.
- Other various threatening and disturbing actions conducted by Glidden and Sims that undermined the very oath they undertook when they signed the Shelter Guest Agreement.
- The shelter staff's inaction and allowance of this pervasive, dangerous conduct.
- The complete chronology of misconduct from the moment Travis Glidden and Jordan Sims were admitted as residents in 2024, which is essential to demonstrate the shelter's knowledge and its pattern of minimal or ineffective discipline in response to escalating threats.

Without this footage, Plaintiffs are robbed of their best and most credible means of proving the severity of the environment, the credibility of their claims, and the Defendants' knowledge and ratification of the conduct. The spoliation was not accidental; it was the predictable result of a conscious choice not to suspend a routine destruction policy after the duty to preserve attached. The subsequent false certifications and refusal to obey this Court's order are not separate missteps; they are the cover-up.

II. RELIEF REQUESTED

Plaintiffs respectfully request that the Court, after notice and an opportunity for an expedited hearing, impose the following sanctions and grant the following relief in a staged manner:

A. IMMEDIATE INTERIM AND CORRECTIVE RELIEF:

1. **Order to Compel Compliance & Show Cause:** Issue an Order (1) compelling Defendant Sheltering Silverton to file, within 7 days, the sworn technical declaration required by this Court's December 5, 2025 Preservation Order (Exhibit B, ¶2); and (2) requiring Defendants Sheltering Silverton, Sarah White, and their counsel Guy Keating to appear and show cause why they should not be sanctioned for spoliation, false certification, and willful disobedience of a court order.
2. **Striking of False Filings:** Strike the false factual assertions in paragraphs 3 and 4 of the December 17 and December 23, 2025 Declarations of Guy Keating (**Exhibits E & G**),

and strike the associated "Motion to Dissolve or Modify Preservation Order" (and its "amended" version, Exhibit I) in its entirety as founded upon false certifications.

3. **Corrective Declaration:** Order Guy Keating to file a corrective declaration, under penalty of perjury, within 7 days, admitting service of the Preservation Order and retracting his false statements regarding conferral.

B. FOLLOWING AN EXPEDITED EVIDENTIARY HEARING:

4. **Evidentiary and Issue Sanctions:** Upon a finding of spoliation and willful disobedience, issue an order that, at trial:

a. The jury shall be instructed that it must presume the destroyed 2024-2025 CCTV footage would have been unfavorable to Defendants and would have substantiated Plaintiffs' claims of threatening, violent, and outrageous conduct by Sims and Glidden, and the shelter's knowledge and failure to act.

b. Defendants Sheltering Silverton and Sarah White are precluded from offering any testimony or argument contradicting the facts established by this adverse inference or suggesting the lost footage was irrelevant or benign.

5. **Monetary Sanctions:** Order Sheltering Silverton and Sarah White, jointly and severally, and Guy Keating and his firm, Schulte, Anderson, Downes, Aronson & Bittner P.C., jointly and severally, to pay all Plaintiffs' reasonable expenses (including significant Plaintiff personal time investment) incurred in investigating the spoliation, opposing the Motion to Dissolve, and prosecuting this sanctions motion.

C. REFERRAL AND TERMINATING RELIEF:

6. **Referral for Disciplinary and Criminal Investigation:** Upon a finding of knowing falsity, refer Guy Keating's conduct to the Oregon State Bar for investigation of violations of RPC 3.3 (Candor) and RPC 8.4 (Misconduct), and refer the matter of his sworn declarations to the Marion County District Attorney for investigation of potential criminal violations of *ORS 162.065* (Perjury).

7. **Judgment on Liability:** Upon a finding of willful spoliation coupled with irreparable prejudice to Plaintiffs' ability to prosecute their claims, enter judgment on the issue of

liability in favor of Plaintiffs and against Defendants Sheltering Silverton and Sarah White on all relevant claims.

III. LEGAL STANDARDS GOVERNING THIS MOTION

1. **ORCP 17 – Sanctions for False Certification:** An attorney's signature on a pleading certifies that factual contentions have evidentiary support. ORCP 17 C(4). The rule provides for sanctions, including reasonable expenses, for violations. A motion for sanctions must be made separately, describe the specific conduct alleged to violate the rule, and be served with the court and opposing counsel (with conferral certificate) and allow for 21 days of "safe harbor" correction. ORCP 17 D.
2. **ORCP 46 – Failure to Comply with a Court Order:** If a party fails to obey an order to provide discovery or preserve evidence, the court may issue sanctions as are just, including establishing designated facts, prohibiting the introduction of evidence, striking pleadings, or rendering a default judgment. ORCP 46 B. Terminating sanctions require a finding of willfulness, bad faith, or fault, and that lesser sanctions would be inadequate.
3. **Spoliation & The Duty to Preserve:** The common-law duty to preserve evidence arises when a party reasonably anticipates litigation. *Federated Mut. Ins. Co. v. Anderson*, 108 Or. App. 293, 296 (1991). Once the duty attaches, a party must take reasonable steps to suspend routine destruction policies. *Manual for Complex Litigation (Fourth) § 11.442*. The sanction for spoliation is designed to deter destruction, place the risk of error on the spoliator, and restore the prejudiced party.
4. **ORS 162.065 – Perjury:** A person commits the crime of perjury if the person makes a false sworn statement in regard to a material issue, knowing the statement to be false. A court may refer evidence of potential criminal conduct to the appropriate prosecuting authority.

///

///

///

///

///

IV. STATEMENT OF UNDISPUTED FACTS: A CHRONOLOGY OF OBSTRUCTION

The following timeline is established by the attached **Chronology Report (Exhibit A)** and the documentary record filed with the Court. This chronology reveals not mere error, but a conscious course of conduct.

A. The Trigger of the Duty and the Court's Intervention.

1. **July 28, 2025**: Plaintiff served formal, detailed written notice on Sheltering Silverton's management (**Exhibit J**), outlining his claims and specifically demanding information about video retention. This letter triggered the common-law **duty to preserve** all relevant evidence, including CCTV footage from the period when Sims and Glidden were residents.
2. **December 5, 2025**: This Court, recognizing the immediate risk of evidence loss, signed the Preservation Order (**Exhibit B**). **Paragraph 2** mandated that "Defendant Sheltering Silverton shall FILE a sworn technical declaration" detailing its CCTV systems within **fourteen (14) days**---a deadline of **December 19, 2025**.
3. **December 6 & 11, 2025**: Plaintiff served the signed Order on all defense counsel of record via email (**Exhibit C**) and filed a Proof of Service with the Court (**Exhibit D**).

B. The Falsehoods: Constructing a Factual Predicate on Sand.

4. **December 17, 2025**: In lieu of complying with the Court's Order, Defendants filed a "Motion to Dissolve or Modify Preservation Order."
   - **Declaration of Guy Keating (Dec. 17) (Exhibit E)**: Counsel declared under penalty of perjury: (1) "I was never served by plaintiff with the Preservation Order," and (2) "Plaintiff has never attempted to confer with me about the Preservation Order."
   - **Declaration of Sarah White (Dec. 17)**: The client mirrored her counsel, declaring she and the organization were never served.
   - **These statements were objectively, demonstrably false when made.**

///

///

C. The Opportunity to Correct: Grace and Warning Ignored.

5. **December 18, 2025**: Plaintiff filed a comprehensive Opposition, attaching Exhibits A-F which *laid bare the complete service history*.

6. **December 19, 2025**: Plaintiff served a detailed UTCR 5.010 conferral email on Mr. Keating (**Exhibit F**). It identified the false statements, **demanded correction by December 22, 2025, at 5:00 p.m.**, and provided formal notice of intent to seek ORCP 17 sanctions.

7. **December 22, 2025 (5:00 PM)**: The safe-harbor deadline passed. No correction was made.

D. The Deceptive "Amendment" and Willful Disobedience.

8. **December 23, 2025**: Faced with undeniable proof, Defendants took divergent paths.

- **Sarah White**: Filed an "Amended Declaration" (**Exhibit H**) admitting she was served and calling her prior false statement an "oversight."

- **Guy Keating**: Filed an "Amended Declaration of Guy Keating" (**Exhibit G**). The only changes were the date and title. **The two key false statements in paragraphs 3 and 4 remained verbatim, uncorrected.**

- **Defendants' "Amended" Motion to Dissolve (Exhibit I)**: Defendants filed an amended motion, continuing to rely on the false factual premise.

- **The ¶2 Declaration**: The Court's December 5 order remained disobeyed. No technical declaration was filed.

9. **December 26, 2025 (5:00 PM PST)**: The final, extended deadline for Sarah White to produce the court-ordered ¶2 technical declaration passed. **No declaration was produced.** This transitioned failure from neglect to willful defiance.

///

///

///

///

///

///

V. ARGUMENT

A. SANCTIONS UNDER ORCP 17 FOR FALSE CERTIFICATION BY COUNSEL.

1. **Guy Keating's Declarations Violate ORCP 17.** ORCP 17 C(4) requires an attorney's signature to certify that factual contentions "have evidentiary support." Guy Keating's December 17 and December 23 declarations (**Exhibits E & G**) contain the categorical, factual assertions detailed in **Facts ¶¶4 & 8**. These statements—that he was never served and that Plaintiff never attempted to confer—were demonstrably false when made, as proven by **Facts ¶3**. His certification was therefore false.
2. **The "Amendment" as Evidence of Knowledge and Intent.** As established in Facts **¶8**, his conduct after notice extinguishes any possible argument of good-faith mistake. On December 23, he had a clear choice: follow his client's example and correct the record, or not. He chose not. This selective correction—fixing the client's lie while retaining his own identical lie—is powerful, circumstantial evidence that the falsehood was strategic and knowing. An "amendment" that changes only the date while preserving known inaccuracies is a deception, not a correction.
3. **The Mischaracterization of Conferral.** His second statement—"Plaintiff has never attempted to confer with me about the Preservation Order"—is doubly violative. First, as a factual matter, Plaintiff's December 6 email transmitting the Order invited dialogue, and the December 19 email (**Exhibit F**) was explicit conferral (**Facts ¶6**). Second, it is a **knowing mischaracterization of the law**. The underlying Motion for Preservation was filed *ex parte* under ORCP 79, for which prior conferral is expressly *not required* when immediate action is needed to prevent evidence loss.

B. SANCTIONS UNDER ORCP 46 FOR SPOLIATION AND WILLFUL DISOBEDIENCE BY THE CLIENT.

1. **Spoliation of Critical Evidence.** Spoliation is the destruction or significant alteration of evidence, or the failure to preserve property for another's use in pending litigation. The

duty to preserve attached no later than July 28, 2025 (**Facts ¶1**). Sarah White's own December 23 declaration (**Exhibit H**) admits the central fact: "All of the footage... was automatically deleted before plaintiff filed this suit and cannot be recovered." A party cannot shield itself from spoliation sanctions by claiming an "automatic" system deleted evidence *after* the duty to preserve attached. The obligation is to intervene and suspend routine processes.

2. **Willful Violation of This Court's December 5 Order.** Disobedience of a direct court order is sanctionable under ORCP 46 and the Court's inherent authority. The Order's command was simple, specific, and timely: file a sworn technical declaration by December 19 (**Facts ¶2**). This was ignored (**Facts ¶4**). Plaintiff's conferral extended the deadline to December 26 (**Facts ¶6**). This too was ignored (**Facts ¶9**). Two missed deadlines demonstrate a pattern of intentional non-compliance. The "Amended Declaration" of Sarah White is *not* the declaration the Court ordered and fails to provide the required information, as shown below:

COMPARISON: COURT ORDER VS. DEFENDANTS' NON-COMPLIANCE

Requirement of Preservation Order (Exhibit B, ¶2)	What Defendants Provided (Exhibit H & Record)
1. The brand, model, and location of all CCTV recording devices.	**NOT PROVIDED.**
2. The digital storage system/format used.	**NOT PROVIDED.** (Mentions "Eufy system" but no details).
3. The standard retention period or storage capacity.	**NOT PROVIDED.**
4. The date range of any footage that was preserved.	**NOT PROVIDED.** States all footage was deleted.

Requirement of Preservation Order (Exhibit B, ¶2)	What Defendants Provided (Exhibit H & Record)
5. The specific steps taken to preserve footage after July 28, 2025.	**NOT PROVIDED.** Admits no steps were taken to suspend auto-delete.

C. THE UNAUTHORIZED "AMENDED" FILINGS VIOLATE ORCP 23.

1. **The Procedural Violation is Clear and Knowing.** ORCP 23 A controls amended pleadings. Defendants did not obtain leave of court to file their "Amended Motion to Dissolve or Modify Preservation Order" (**Exhibit I**) or the "Amended" Declarations of Guy Keating and Sarah White (**Exhibits G & H**). Critically, they also did not have—and knew they did not have—the written consent of the adverse party. Plaintiff's December 19, 2025 conferral email (**Exhibit F**) expressly stated: **"Plaintiff will not consent to any unilateral amendment of the Motion or declarations and will accept only the Court's ruling on any motion for leave."** It further instructed that "any amendment must be sought by a motion for leave filed with the Court (not by private agreement)." Defendants were thus on explicit notice that consent was withheld and that court permission was required. Their decision to file the "amended" documents regardless was a knowing violation of ORCP 23.
2. **The Violation is Part of the Pattern of Obstruction.** This is not a mere technicality. The decision to file amended pleadings without authorization—and in direct contravention of Plaintiff's clear directive—is of a piece with Defendants' broader strategy of ignoring court rules and orders. Having been caught in demonstrable falsehoods in their original December 17 filings (**Facts ¶4**), Defendants did not seek the Court's permission to correct the record. Instead, they unilaterally filed "amended" documents, attempting to sidestep the Court's oversight. This brazen act compounds the misconduct at issue.

3. **Requested Relief.** This knowing procedural violation provides an independent and compelling basis to strike the "Amended" Motion to Dissolve and the associated "Amended" Declarations (**Exhibits G, H, & I**).

D. THE MISCONDUCT FORMS AN INTERCONNECTED PATTERN WARRANTING SEVERE SANCTIONS; THE LOST EVIDENCE CAUSES IRREPARABLE PREJUDICE.

The misconduct of the client and the attorney are synergistic parts of a single strategy to obstruct. The prejudice to Plaintiffs is catastrophic and specific. The CCTV footage was the only objective, contemporaneous record of the events forming the basis of all claims. Its loss irreparably prevents Plaintiffs from proving essential elements of their case, as detailed below:

SPECIFIC PREJUDICE FROM LOST CCTV FOOTAGE

Claim	Essential Element Impaired	Specific Lost Evidence	Why Unreplaceable
Negligence/Negligent Security	Duty, Breach, Causation—Defendants' knowledge of dangerous conditions & failure to act.	Footage showing staff observing but not intervening in threats/violence (e.g., death threat to Langloss, arson threats, August 2024 confrontation).	Witness testimony is subjective and may be contested; video was objective, indisputable proof of notice and inaction.

Claim	Essential Element Impaired	Specific Lost Evidence	Why Unreplaceable
Negligent Infliction of Emotional Distress	Defendant's negligent conduct caused severe emotional distress.	Footage of the graphic, threatening monologues and violent outbursts Plaintiffs were forced to witness and fear.	Proves the extreme and outrageous nature of the conduct Plaintiffs were subjected to over time.
Ratification	Defendant's knowledge and approval of intentional torts.	Footage of ongoing misconduct by Sims/Glidden and the shelter's lack of meaningful discipline from their admission forward.	Demonstrates a pattern of acquiescence and failure to protect, turning isolated acts into a ratified course of conduct.

Monetary sanctions compensate Plaintiff for being forced to litigate against falsehoods and obstruction. Evidentiary sanctions (adverse inference, preclusion) are necessary but, given the totality of the misconduct and the prejudice, the Court should also consider the ultimate sanction of judgment on liability.

///

///

///

E. ANTICIPATED DEFENSE REBUTTAL: THE "AUTOMATIC SYSTEM" AND "HELPLESSNESS" ARGUMENT IS LEGALLY AND FACTUALLY INSUFFICIENT.

Defendants will predictably argue the loss was due to an "automatic" system and they are therefore not at fault. This argument is meritless:

1. **The Duty Likely Attached Earlier:** The duty to preserve arises when litigation is reasonably anticipated. The Amended Complaint pleads extensive, specific notice to Sarah White throughout 2024 regarding violent threats and risks. The July 28, 2025 email was a formal culmination, not the inception, of notice.
2. **Failure of the Ongoing Duty:** Even under their July 28 timeline, Defendants failed. Upon the trigger of the duty, a party must take **reasonable steps** to preserve evidence, including suspending automatic deletion routines. Sarah White admits no such steps were taken. Their willful refusal to file the Court-ordered technical declaration (**Facts ¶9**) prevents verification of their own claims about the system.
3. **Legally Insufficient Excuse:** Oregon law does not recognize a "good faith, automatic deletion" defense to spoliation. The sanction focuses on the **obligation to preserve**. By failing to intervene in their own system's operation, Defendants breached their duty.
4. **Subsequent Conduct Undermines Good Faith:** The subsequent pattern of falsehoods and disobedience confirms the goal is obstruction, not transparency.

VI. CONCLUSION

The record documents more than advocacy; it reveals obstruction. The duty of candor was breached. A direct court order was flouted. Critical evidence was destroyed. The Court's authority to sanction is not merely a power—it is a duty.

///

///

///

///

///

EXHIBIT INDEX

Exhibit A: Chronology Report: Defendants' Pattern of Obstruction

Exhibit B: Preservation Order, signed December 5, 2025

Exhibit C: Service Email to Guy Keating (Dec 6, 2025)

Exhibit D: Proof of Service for Preservation Order (filed Dec 11, 2025)

Exhibit E: Declaration of Guy Keating (filed Dec 17, 2025)

Exhibit F: UTCR 5.010 Conferral Email (Dec 19, 2025)

Exhibit G: "Amended" Declaration of Guy Keating (filed Dec 23, 2025)

Exhibit H: Amended Declaration of Sarah White (filed Dec 23, 2025)

Exhibit I: Defendants' "Amended" Motion to Dissolve (filed Dec 23, 2025)

Exhibit J: July 28th, 2025 Email to Operations Director Megan Smith Regarding Video Evidence

Exhibit K: Email to Sarah White Dated August 19th, 2024 Regarding Travis Glidden Concerns

DATED: December 30th, 2025

Respectfully submitted,

/s/ Adam Kobs

Adam E. Kobs, Plaintiff, pro se
Residential address confidential (CIF filed under UTCR 2.130)
Email: adamkamazon1@gmail.com | Phone: 503-580-4776

///

///

///

///

CERTIFICATE OF SERVICE UNDER UTCR 5.100

I, Adam E. Kobs, Plaintiff appearing pro se in the above-entitled matter, hereby certify that on December 30th, 2025, I served the following document(s) on all parties of record via the means specified:

- PLAINTIFF'S MOTION FOR SANCTIONS AGAINST GUY KEATING AND SARAH WHITE / SHELTERING SILVERTON; JUDGEMENT ON LIABILITY IN FAVOR OF PLAINTIFF; ADVERSE INFERENCE; REFERRAL FOR PERJURY

Service was made as follows:

Upon Defendants' Counsel of Record: Guy Keating, Esq. (gkeating@schulte-law.com), Tyler Honn (thonn@schulte-law.com), Matthew Smith (msmith@schulte-law.com), Rochelle Murphy (rmurphy@schulte-law.com) via electronic mail (ORCP 9 G), with the document(s) attached in PDF format.

Upon the Court: A true copy was filed electronically with the Marion County Circuit Court via the Odyssey File & Serve system.

This service is made in compliance with ORCP 9 and UTCR 5.100. The motion for sanctions under ORCP 17 is served to **commence the 21-day safe harbor period prescribed by ORCP 17 D, during which the challenged party may correct or withdraw the offending paper, claim, or allegation.**

DATED: December 30th, 2025

Respectfully submitted,

/s/ Adam Kobs

Adam E. Kobs, Plaintiff, pro se
Residential address confidential (CIF filed under UTCR 2.130)
Email: adamkamazon1@gmail.com | Phone: 503-580-4776

CERTIFICATE OF CONFERRAL UNDER UTCR 5.010

I, Adam E. Kobs, Plaintiff appearing pro se, hereby certify that prior to the filing of Plaintiff's Motion for Sanctions Under ORCP 17, I have complied with the conferral requirements of UTCR 5.010.

1. Conferral Conducted: On December 19th, 2025, I served a detailed UTCR 5.010 conferral email upon all counsel of record for Defendants. The email identified with specificity the conduct alleged to violate ORCP 17—namely, the submission of sworn declarations containing false factual assertions regarding service of the Court's Preservation Order—and demanded corrective action by a deadline of December 22, 2025, at 5:00 PM PST.

2. Result of Conferral: The Defendants and their counsel did not correct the challenged statements by the specified deadline. Nor did they file a motion for leave to correct the record with the Court. The issues raised in the conferral were not resolved. **The 21-day "safe harbor" period referenced in ORCP 17 D is now in effect following the separate service of the motion itself.**

This certification is made to satisfy UTCR 5.010 for the filing of Plaintiff's Motion for Sanctions Under ORCP 17.

DATED: December 30th, 2025

Respectfully submitted,

/s/ Adam Kobs

Adam E. Kobs, Plaintiff, pro se
Residential address confidential (CIF filed under UTCR 2.130)
Email: adamkamazon1@gmail.com | Phone: 503-580-4776

Exhibit A

Chronology Report: Defendants' Pattern of Obstruction

CHRONOLOGY REPORT: DEFENDANTS' ACTIONS AND FALSE CERTIFICATIONS REGARDING THE PRESERVATION ORDER

This report provides a complete, chronological account of events related to the duty to preserve evidence, the Court's Preservation Order, and the subsequent false statements and conduct of Defendants and their counsel. The timeline is based on documents filed with the Court and correspondence between the parties, which are attached as exhibits to the accompanying Motion for Sanctions.

I. BACKGROUND: NOTICE AND THE DUTY TO PRESERVE (2024 – JULY 2025)

- **August 19, 2024:** Plaintiff sent a formal text message and a detailed email to Defendant Sarah White, Executive Director of Sheltering Silverton, pleading for intervention regarding the violent and disturbing behavior of resident Travis Glidden. The email stated, "I fear for the safety and security of myself and my son and I won't tolerate Travis' behavior any longer. The man is a trained marine with a capacity to grab a weapon and start killing people." This communication formally notified the shelter director of the immediate danger and threatened Plaintiff's departure if the threat was not removed. **(See Exhibit K to Motion for Sanctions)**.
- **July 28, 2025:** Plaintiff sent a detailed email to the shelter's Operations Director, Megan Smith, explicitly outlining the August 2024 incident and demanding information about safety protocols, video retention, and 911 policies. This email served as **formal notice** of Plaintiff's claims and the specific evidence sought (including CCTV footage), triggering the common law duty to preserve relevant evidence. **(See Exhibit J to Motion for Sanctions)**.

II. THE PRESERVATION PROCESS: MOTION, ORDER, AND SERVICE (OCT – DEC 2025)

- **October 27, 2025:** Plaintiff filed an *Ex Parte* Motion for Preservation of CCTV and ESI, supported by an ORCP 79 certificate.

- **November 25, 2025:** The Marion County Sheriff personally served the **Amended Complaint and the Motion for Preservation** on Defendant Sarah White as the shelter's registered agent. **(See Exhibit D)**.
- **December 5, 2025:** The Court signed the Preservation Order. Paragraph 2 required Defendant Sheltering Silverton to file a sworn technical declaration detailing its CCTV/ESI systems within fourteen (14) days (**Deadline: December 19, 2025**). **(See Exhibit B)**.
- **December 6, 2025:** Plaintiff served the Court-signed Preservation Order on all defense counsel of record via email under ORCP 9(G). **(See Exhibit C)**.
- **December 11, 2025:** Plaintiff filed a **Proof of Service** for the Preservation Order with the Court, certifying service by email on December 6, 2025. **(See Exhibit D)**.

III. DEFENDANTS' FALSE CERTIFICATIONS AND MOTION TO DISSOLVE (DECEMBER 17, 2025)

- **December 17, 2025:** Defendants filed a "Motion to Dissolve or Modify Preservation Order." The motion's central factual argument was that "Plaintiff did not serve either Silverton Sheltering Services or its counsel with the Preservation Order."
    - **Declaration of Guy Keating (Dec. 17):** Defense counsel Guy Keating declared under penalty of perjury:
        1. "I was never served by plaintiff with the Preservation Order."
        2. "Plaintiff has never attempted to confer with me about the Preservation Order." **(See Exhibit E)**.
    - **Declaration of Sarah White (Dec. 17):** Defendant Sarah White similarly declared under penalty of perjury that she and the organization were never served with the Order.
- **These sworn statements were objectively false when made**, contradicted by the documentary record: the service email **(Exhibit C)**, and the filed Proof of Service **(Exhibit D)**.

///

///

IV. PLAINTIFF'S OPPOSITION AND CONFERRAL ATTEMPT (DECEMBER 18-19, 2025)

- **December 18, 2025:** Plaintiff filed a comprehensive *Opposition to Defendants' Motion to Dissolve Preservation Order*, attaching exhibits which documented the complete service history and refuted the defense's factual premise. Defendants were also served the same day.
- **December 19, 2025:**
  - Plaintiff served a UTCR 5.010 conferral email on defense counsel Guy Keating. The email:
    - Attached documentary proof of service.
    - Identified the statements in the Keating and White declarations as false.
    - Demanded correction of the false statements by **December 22, 2025, at 5:00 PM PST**.
    - Provided formal notice of intent to seek sanctions under ORCP 17 if the statements were not corrected.
  - **The Deadline Passes:** The court-ordered deadline for Defendants to file the Paragraph 2 technical declaration (**December 19, 2025**) passed. No declaration was filed.

V. DEFENDANTS' POST-CONFERRAL FILINGS: SELECTIVE AND INCOMPLETE CORRECTION (DECEMBER 23, 2025)

- **December 22, 2025 (5:00 PM):** Plaintiff's deadline for corrective action passed. No correction was filed.
- **December 23, 2025:** Defendants filed amended documents.
  - **Amended Declaration of Sarah White:** Ms. White filed an amended declaration which **admitted she was served** with the underlying motion on November 25, 2025, and characterized her prior false statement as an "oversight." This was a material correction. **(See Exhibit H)**.
  - **Amended Declaration of Guy Keating:** Mr. Keating filed an "Amended" declaration. The only changes from the December 17 version were the date and

the document title. **The two key false statements regarding service and conferral remained verbatim and uncorrected. (See Exhibit G)**.

- **Amended Motion to Dissolve:** Defendants filed an amended motion continuing to rely on the uncorrected factual premise. **(See Exhibit I)**.

VI. SUMMARY OF CURRENT STATUS AND PATTERN OF CONDUCT

1. **Uncorrected False Certification:** Defense counsel Guy Keating's sworn declaration contains statements directly contradicted by the Court's record. He was given notice of their falsity and an opportunity to correct them but declined.
2. **Non-Compliance with Court Order:** Defendant Sheltering Silverton has failed to comply with Paragraph 2 of the Court's December 5 Preservation Order, missing the December 19, 2025 deadline without explanation.
3. **Pattern of False Statements and Obstruction:** The sequence reveals a pattern: (a) filing declarations with demonstrably false facts to support a motion to dissolve a court order; (b) failing to correct the attorney's falsehood even after being confronted with evidence and after correcting the client's identical falsehood; (c) continuing to defy the substantive requirements of the same court order.
4. **Pending Motion:** Defendants' "Amended Motion to Dissolve" the Preservation Order **(Exhibit I)** remains pending, relying on the factual premise supported by the uncorrected Keating declaration **(Exhibit G)**.
5. **Sanctions Sought:** Plaintiff has now filed a Motion for Sanctions based on this pattern of conduct, seeking relief including corrective orders, evidentiary sanctions, monetary sanctions, referral of Mr. Keating to the Oregon State Bar for misconduct, referral to the Marion County District Attorney for review of perjury, and a judgment on liability.

VII. CONCLUSION

This chronology outlines a course of conduct in which initial factual certifications to the Court were demonstrably false. When provided with clear notice, evidence, and an opportunity to correct the record, defense counsel chose to leave his own false statements intact while allowing his client's identical statements to be corrected. This selective amendment occurred alongside a

separate, ongoing failure to comply with the Court's direct order to preserve and describe critical evidence, necessitating the instant Motion for Sanctions.

Respectfully submitted,

DATED: December 30, 2025

.

/s/ Adam Kobs

Adam E. Kobs, Pro Se

Plaintiff

Exhibit B

Preservation Order, signed December 5, 2025

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MARION

ADAM EUGENE KOBS, an individual., and **N.K.**, a minor, by and through his father and natural guardian, ADAM E. KOBS, *Plaintiffs,* v. **SILVERTON SHELTERING SERVICES,** d.b.a. **"SHELTERING SILVERTON,"** an Oregon public-benefit nonprofit corporation, **SARAH WHITE**, individually; **JOSEPH SCHMAUS**, individually; **JORDAN SIMS**, individually; and **TRAVIS DEAN GLIDDEN**, individually; *Defendants.*	Case No. 25CV57849 PROPOSED ORDER: PRESERVATION OF SHELTERING SILVERTON CCTV AND ESI

Upon Plaintiffs' Motion and supporting Declaration, and good cause appearing, **IT IS ORDERED**:

1. Silverton Sheltering Services d.b.a. "Sheltering Silverton" shall immediately suspend deletion/overwriting and preserve the following from January 1, 2024 to present, and prospectively during this action:

a. All CCTV footage (native format) from cameras covering interior sleeping bays, hallways, entries/exits, common areas, incident-handling offices; and exterior cameras covering entries and adjacent walkways/parking at 830B McClaine St., Silverton, OR 97381.

b. Access control/key-fob/badge logs; visitor logs; incident check-in/out logs; incident reports/logs (all versions); trespass/readmission records; client warnings/"strikes."

c. Emails, texts, and messages among Shelter staff/board referencing Plaintiffs; Travis

Dean Glidden; Jordan Sims; safety protocols; 911 policies; incident narratives; preservation requests; and CCTV handling/retention.

d. Policies/procedures for CCTV retention, deletion schedules, and evidence-preservation SOPs.

e. Relevant data on Shelter-issued devices and personal devices used for Shelter business, subject to proportionality and privacy safeguards.

2. Within 14 days, the Shelter shall provide a sworn declaration identifying: (i) camera locations and retention settings; (ii) storage locations (e.g., NVR/cloud) and any deletions since July 28, 2025; (iii) systems for incident documentation and messaging; (iv) likely custodians; and (v) steps taken to comply with this Order.

3. Metadata shall be preserved. No alteration, re-encoding, or compression may occur that changes native CCTV content without agreement or court order.

4. This Order preserves but does not compel production. The parties shall meet and confer within 21 days and submit an ESI protocol or competing proposals.

5. This Order remains in effect unless modified by the Court.

6. Enforcement/Fees and Vendor Costs: Upon a finding that any party violated this Order, the Court may impose remedial sanctions, including requiring payment of a sum sufficient to compensate the aggrieved party for losses and costs resulting from the violation, such as reasonable attorney fees and third-party e-discovery/forensic vendor costs incurred to investigate, mitigate, restore, or validate affected CCTV/ESI, in addition to any discovery sanctions under ORCP 46 and consideration of the ORS 20.075 factors.

12/5/2025 11:41:10 AM

Circuit Court Judge Daniel J Wren

UTCR 5.100 CERTIFICATE (EX PARTE SUBMISSION)

I certify this proposed order is submitted ex parte under [ORCP 79 / UTCR authority / statutory authority], no party has appeared, and service of the proposed order before entry is not required.

DATED: October 27th, 2025

Respectfully submitted,

/s/ Adam Kobs

Adam E. Kobs, Pro Se
Residential address is confidential; Confidential Information Form (CIF) filed under UTCR 2.130
Email: adamkamazon1@gmail.com | Phone: 503-580-4776

Exhibit C

Service Email to Guy Keating (Dec 6, 2025)

Gmail

Adam K <adamkamazon1@gmail.com>

Signed Preservation Order; 14-Day Declaration (Point #2) – Due 12/19/2025

1 message

Adam K <adamkamazon1@gmail.com> Sat, Dec 6, 2025 at 11:58 AM
To: Tyler Honn <thonn@schulte-law.com>, Matthew Smith <msmith@schulte-law.com>, Guy Keating <gkeating@schulte-law.com>, Rochelle Murphy <rmurphy@schulte-law.com>

Mr. Keating,
Please see the attached signed Preservation Order regarding Sheltering Silverton's CCTV and ESI (Judge Wren signed12/5/2025). This email is service under ORCP 9(G); as you have consented to email service, service is complete upon transmission.
For clarity, the order requires the following of Sheltering Silverton:

1. Immediate suspension of deletion/overwriting and preservation of specified categories of CCTV and ESI from 1/1/2024 forward and prospectively during the action.
2. **Within 14 days**, provision of a sworn declaration identifying: (i) all camera locations and retention settings; (ii) storage locations (e.g., NVR/cloud) and any deletions since 7/28/2025; (iii) systems for incident documentation and messaging; (iv) custodians reasonably likely to have relevant ESI; and (v) steps taken to comply with the order.
3. Preservation of metadata and chain-of-custody; no alteration, re-encoding, or compression that changes native CCTV content absent agreement or court order.
4. A meet-and-confer within 21 days and submission of an ESI protocol or competing proposals if needed.
5. The order preserves, but does not compel, production and is without prejudice to objections.
6. Enforcement provisions concerning remedial sanctions and fees if a violation is found.

Deadline for Point #2: Because the order states only "within 14 days," the period runs from the order date, not service. Under ORCP 10(A), excluding 12/5/2025 and counting forward 14 days, the declaration is due on Friday, December 19, 2025. The ORCP 10(B) +3 days for service does not apply because the period is not measured from service.
Please confirm the individual who will sign the declaration and whether you prefer simultaneous filing with the court or service only. Also, to facilitate the Point #4 meet-and-confer on the ESI protocol, kindly propose dates the week of December 22 or December 29, or we can hold it earlier if you prefer.

Regards,

Adam Kobs Plaintiff, pro se
Kobs v. Sheltering Silverton et al., No. 25CV57849
adamkamazon1@gmail.com | 503-580-4776

CCTV and ESI Signed Order.PDF
99K

Exhibit D

Proof of Service for Preservation Order (filed Dec 11, 2025)

12/11/2025 5:53 AM
25CV57849

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR MARION COUNTY

ADAM EUGENE KOBS, an individual, and **N.K.,** a minor, by and through his father and natural guardian, ADAM E. KOBS**,**
Plaintiffs,

v.

SILVERTON SHELTERING SERVICES d.b.a. **"SHELTERING SILVERTON,"** an Oregon public-benefit nonprofit corporation; **SARAH WHITE**, individually; **JOSEPH SCHMAUS**, individually; **JORDAN SIMS**, individually; and **TRAVIS DEAN GLIDDEN**, individually,
Defendants,

Case No. 25CV57849

PROOF OF SERVICE
(ORCP 9(G) – SERVICE BY EMAIL

I, Adam E. Kobs, declare under penalty of perjury:

1. I am a party to this action. This proof is made pursuant to ORCP 9(C)(3) and 9(G).
2. On December 6, 2025, at 11:58 AM Pacific Time, I served by e-mail a true and correct copy of the court-signed Order Granting Plaintiffs' Motion for Preservation of CCTV and Electronically Stored Information (ESI).
3. Service by e-mail was made to the following counsel for Defendants, who have consented to service by e-mail under ORCP 9(G):

- Guy Keating – gkeating@schulte-law.com
- Rochelle Murphy – rmurphy@schulte-law.com
- Matthew Smith – msmith@schulte-law.com
- Tyler Honn – thonn@schulte-law.com

4. The service e-mail was sent from: adamkamazon1@gmail.com. Service was completed upon transmission pursuant to ORCP 9(G). No delivery failure notice was received.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: December 11th, 2025.

Respectfully submitted,

/s/ Adam Kobs

Adam E. Kobs, Pro Se
Residential address is confidential; Confidential Information Form (CIF) filed under UTCR 2.130
Email: adamkamazon1@gmail.com | Phone: 503-580-4776

Exhibit E

Declaration of Guy Keating (filed Dec 17, 2025)

12/17/2025 2:35 PM
25CV57849

IN THE CIRCUIT COURT OF THE STATE OF OREGON

FOR THE COUNTY OF MARION

ADAM EUGENE KOBS, an individual, and N.K., a minor, by and through his father and natural guardian, Plaintiff, v. SILVERTON SHELTERING SERVICES d.b.a. SHELTERING SILVERTON, an Oregon nonprofit corporation; SARAH WHITE, an individual; JOSEPH SCHAMUS, an individual; JORDAN SIMS, an individual; and TRAVIS DEAN GLIDDEN, an individual, Defendants.	Case No. 25CV57849 **DECLARATION OF GUY KEATING IN SUPPORT OF MOTION TO DISSOLVE OR MODIFY PRESERVATION ORDER**

I, Guy Keating, hereby declare under penalty of perjury as follows:

1. I am the trial attorney for defendants Silverton Sheltering Services, Sarah White, and Joseph Schamus in this matter.
2. This declaration is based on my personal knowledge, and I am competent to testify to the matters contained herein.
3. I was never served by plaintiff with the Preservation Order.
4. Plaintiff has never attempted to confer with me about the Preservation Order.

///

///

///

SCHULTE, ANDERSON, DOWNES, ARONSON & BITTNER P.C.
811 SOUTHWEST NAITO PARKWAY, SUITE 500
PORTLAND, OREGON 97204-3379
TELEPHONE (503) 223-4131
FAX (503) 223-1346

I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

Dated this 17th day of December, 2025.

/s/ Guy Keating
Guy Keating

SCHULTE, ANDERSON, DOWNES, ARONSON & BITTNER P.C.
811 SOUTHWEST NAITO PARKWAY, SUITE 500
PORTLAND, OREGON 97204-3379
TELEPHONE (503) 223-4131
FAX (503) 223-1346

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing **DECLARATION OF GUY KEATING IN SUPPORT OF MOTION TO DISSOLVE OR MODIFY PRESERVATION ORDER** on the date indicated below and to the party/attorney(s) indicated below:

☐ Courtesy mail with postage prepaid, deposited in the US mail at Portland, Oregon; I further certify that said copy was placed in a sealed envelope delivered to attorneys at the addresses listed below.

☒ OJD Efiling System (File & Serve) (i.e., "Electronic service" means the electronic transmission of a notice of filing by the electronic filing system to the electronic mail (email) address of a party who has consented to electronic service under UTCR 21.100(1)).

☒ Via Email.

Adam Kobs
Adamkamazon1@gmail.com
Plaintiff Pro Se

DATED: December 17, 2025

/s/ Guy Keating
Guy E. Keating, OSB No. 074367
gkeating@schulte-law.com
Of Attorneys for Defendants

SCHULTE, ANDERSON, DOWNES, ARONSON & BITTNER P.C.
811 SOUTHWEST NAITO PARKWAY, SUITE 500
PORTLAND, OREGON 97204-3379
TELEPHONE (503) 223-4131
FAX (503) 223-1346

Exhibit F

UTCR 5.010 Conferral Email (Dec 19, 2025)

Gmail

Adam K <adamkamazon1@gmail.com>

UTCR 5.010 Conferral — Demand to Correct Motion/Declarations; ¶2 Technical Declaration; Notice of Intended Filings (Kobs v. Sheltering Silverton, No. 25CV57849)

1 message

Adam K <adamkamazon1@gmail.com> Fri, Dec 19, 2025 at 8:00 AM
To: Guy Keating <gkeating@schulte-law.com>
Cc: Tyler Honn <thonn@schulte-law.com>, Matthew Smith <msmith@schulte-law.com>, Rochelle Murphy <rmurphy@schulte-law.com>

Mr. Guy Keating and Respective Counsel:
This e-mail is the UTCR 5.010 conferral required before filing motions under ORCP 21 and ORCP 36–46. **I intend to confer with the Defense over email only, and this remains satisfactory for the court.**
I am writing to demand immediate, narrow corrective action and to give notice of the filings that will follow if the record and the Court's Preservation Order are not corrected and complied with as set forth below.

1) Immediate corrections demanded (deadline: Monday, December 22, 2025 at 5:00 PM PST).

- By **12/22/2025 at 5:00 PM PST**, Defendants must either: (a) withdraw the Motion to Dissolve the Preservation Order and remove it from the docket; or (b) file a *full* corrective submission that (i) amends the Motion to Dissolve to reflect truthful claims, (ii) files corrected declarations for Guy Keating and Sarah White under penalty of perjury that candidly admit and correct any erroneous factual assertions about service and preservation, and (iii) files a corrected proposed order if any prior proposed order remained inaccurate. If Defendants choose correction rather than withdrawal, the correction must be complete — not a partial amendment of the proposed order alone. Because Plaintiff has already filed an opposition, Defendants may not unilaterally amend the Motion to Dissolve or the supporting declarations; any amendment must be sought by a motion for leave filed with the Court (not by private agreement). Plaintiff will not consent to any unilateral amendment of the Motion or declarations and will accept only the Court's ruling on any motion for leave. **This motion for leave is what is expected by Monday, December 22, 2025 at 5:00 PM PST.** Corrections are expected to be carried out by the Defense following a successful executed order.

2) Technical ¶2 declaration demanded (deadline: seven (7) days from this message — by Friday, December 26, 2025 at 5:00 PM PST).

- By **12/26/2025 at 5:00 PM PST**, Defendants must file the sworn technical ¶2 declaration required by the Court's Preservation Order: camera map and camera IDs/models; retention settings for each camera; storage locations and account/administrator identifiers (on-prem NVR and any cloud providers); any deletions since 7/28/2025 shown with vendor/audit logs and user/timestamp evidence; list of custodians reasonably likely to have relevant ESI; and a statement of steps taken to suspend overwriting and preserve native files and metadata. If vendor-authenticated native exports and complete vendor logs showing continuous retention are produced by that time, neutral imaging will not be necessary. Absent such documentation, Plaintiff will move for neutral forensic imaging at Defendants' expense. ORCP 46 authorizes compulsion of such compliance and remedial relief for noncompliance.

3) Filing intentions (no waiver; actions to be taken regardless).

- Plaintiff will file a **Motion for Leave to File a Sur-Reply** (limited to new matters raised in Defendants' Reply) and a **Motion to Strike** (limited to specific portions of Defendants' Reply) — **these motions will be filed regardless of whether defense counsel consents**, unless counsel promptly articulates a legal objection that would be likely to prevail before Judge Wren. The purpose of this conferral is to give counsel a chance to state any such legal objection now; counsel should identify legal authority in support. UTCR 5.010 requires conferral; this email is that conferral.
- Plaintiff will file a **Motion to Compel** under ORCP 46 if the sworn ¶2 declaration or vendor logs are not produced by **12/26/2025 at 5:00 PM PST** (7 days after this conferral email sent 12/19/2025). The Motion to Compel will seek the specific technical ¶2 declaration, preservation of native files and metadata, and neutral forensic imaging at Defendants' expense if native continuity cannot be demonstrated.
- Plaintiff will **file a separate ORCP 17 Motion for Sanctions** promptly (served immediately), irrespective of any cure by Defendants, to make clear the record of the misrepresentations and the prejudice caused; the ORCP 17 motion will permit the 21-day safe-harbor period but will be filed to preserve the claim and to ensure the Court has the full record. ORCP 17 requires a separate sanctions motion describing false certifications with specificity. A separate sanctions motion will address the shelter's lack of compliance with a court order for CCTV/ESI Declaration, should the Defendant not cure the issue by providing the needed Declaration within 7 days of this email.

4) Why Plaintiff will file the sur-reply and motion to strike after Monday 12/22/25 (and regardless).

- Defendants' Reply (12/17/2025) raised new factual assertions and legal points not contained in the opening papers and relied on declarations that deny service and assert deletions — matters not previously litigated and now directly

affecting the Motion to Dismiss and the Motion to Dissolve. Under the rules, Plaintiff must be allowed to respond to new materials presented in a reply so the Court has a complete record. UTCR practice contemplates limited sur-replies where new matters are first presented in reply; Plaintiff will seek leave to file a short sur-reply to avoid prejudice.

- The Motion to Strike is narrowly targeted to portions of the Reply that raise new arguments or facts improperly in reply; it is not a general attack on the declarations (those will be addressed in the sanctions motion). The sur-reply and motion to strike will proceed unless counsel shows a legally tenable ground to oppose those filings to the Court; a simple complaint that Plaintiff "should wait" until the Court rules on other motions is not a legally sufficient basis to deny Plaintiff the opportunity to respond to new matters now.

5) Forecasted Defensive Arguments and Rebuttals

"Wait for the Motion to Dismiss / don't compel preservation until the court rules."

- Response: Preservation obligations and compliance with an existing court order are independent of the merits of the underlying claim; the Court's Preservation Order required a ¶2 technical declaration and a preservation protocol — compliance cannot be unilaterally suspended while a separate motion to dismiss is pending. ORCP 46 authorizes immediate relief to compel compliance. Delay risks irreparable loss of ESI and is not justified by a pending dismissal motion.

"The Motion/Declarations contained a clerical error; we corrected the proposed order — that cures everything."

- Response: A partial correction of a proposed order does not cure false sworn factual assertions in a filed Motion or in sworn declarations; ORCP 17 requires truthful certifications and permits sanctions for false certifications. A claim of "clerical error" is not a blanket excuse where docketed evidence (sheriff returns, Plaintiff's e-mail transmitting the signed order, Plaintiff's proof of service, and the ORCP 79 filing) was publicly available and not checked before signing or filing. If counsel believes a clerical-error defense applies, identify the controlling authority now and file a motion with the Court for leave to correct the record; otherwise Plaintiff will proceed with the ORCP 17 motion and seek corrective relief.

"Shelter's camera system retains video only for a few days / preservation is burdensome."

- Response: If the Shelter's system truly deletes video automatically, the technical ¶2 declaration must specify exactly which native files were deleted, when, and provide vendor/audit logs and account activity showing that deletion; unsupported generalities are not sufficient to avoid the Preservation Order. If native data is unavailable, vendor logs and account records are required to explain loss; if Defendants cannot produce those, neutral forensic imaging is appropriate. ORCP 46 contemplates awarding expenses and other remedies for noncompliance.

"You're seeking wholesale footage."

- Response: The immediate demand is **only** for the sworn ¶2 technical declaration or vendor-authenticated native exports and audit logs sufficient to establish whether native footage remains accessible; it is not a demand for wholesale immediate production of every recording. Production of native files or certified vendor exports is the alternative to forensic imaging. This distinction should end any claim that Plaintiff seeks an overbroad, burdensome demand.

6) Sanctions

- Plaintiff has already incurred time and effort rebutting the Motion to Dissolve and the Reply; Plaintiff perceives a material injustice in counsel certifying lack of service and deletion when docketed proof and e-mail service existed. Plaintiff will file an ORCP 17 sanctions motion promptly to put those misrepresentations before the Court and to seek corrective relief, reimbursement of any expenses, and other remedies allowed under ORCP 17 if the Court finds false certification or wanton misconduct. ORCP 17 requires a separate motion and provides for a 21-day safe-harbor but the motion will be filed now so the Court has the record.

7) Proof of service and preservation of conferral record.

- This message and its attachments constitute the conferral required by UTCR 5.010 and are served by e-mail under ORCP 9(G). Preserve full message headers and attachments; Plaintiff will file a UTCR 5.010 certificate with any motion reflecting this conferral.

8) Deadline for Objections from Defense Counsel to Plaintiff

- Please provide any concise, email-only objection stating the specific legal basis for opposing the conferral demands **no later than 5:00 PM PST on 12/22/2025 (Monday)**; absent a timely, legally cognizable objection, Plaintiff will proceed to file the sur-reply, motion to strike, and other motions described in this conferral without further notice. If counsel timely identifies a specific legal authority showing why any requested filing should not be permitted, please state that authority and a one-sentence explanation in the objection email. Further:

- Because this conferral seeks only a concise, email-only statement of any legal objections (with citations), a two-business-day turnaround (by Monday, 12/22/2025 at 5:00 PM) is reasonable under UTCR 5.010, which requires

good-faith conferral but imposes no fixed response period.
- Absent a specific, substantial scheduling conflict, counsel should be able to articulate any credible, authority-supported objection within that period; Oregon courts and bar guidance expect prompt, meaningful conferral and do not tolerate delay or gamesmanship.
- This short window is also consistent with UTCR's directive to promote the just, speedy, and inexpensive determination of proceedings.

8) Attachments provided with this e-mail (for convenience):
- Signed Preservation Order (12/5/2025)
- Sheriff return / proof of service
- Plaintiff's e-mail transmitting the signed Preservation Order (ORCP 9(G) e-service)
- Defendants' Motion to Dissolve and proposed order (12/17/2025)
- Keating Declaration (12/17/2025)
- White Declaration (12/17/2025)
- Defendants' Reply (12/17/2025)
- Draft Motion for Leave to File Sur-Reply (limited)
- Draft Motion to Strike (limited to Reply)
- Draft ORCP 46 Motion to Compel (technical ¶2 declaration)
- Draft ORCP 17 Motion for Sanctions

9) Short timeline recap:
- Conferral email sent: **Today, 12/19/2025** (this message).
- Correction of Motion/Declarations/Proposed Order: **by 12/22/2025 at 5:00 PM PST** (or withdraw Motion to Dissolve entirely).
- Sworn technical ¶2 declaration or vendor logs/native exports: **by 12/26/2025 at 5:00 PM PST** (7 days from conferral email).

10) Final word:
- Plaintiff prefers to avoid unnecessary motion practice if counsel immediately corrects the record and fully complies with the Preservation Order. However, Plaintiff will not forbear filing the sur-reply or motion to strike — both will be filed unless counsel provides a legal objection substantial enough to persuade the Court not to permit a sur-reply or not to strike the challenged reply material — and Plaintiff will file the ORCP 17 sanctions motion promptly in any event to ensure the Court is aware of the alleged false certifications and the prejudice caused. If counsel elects to correct the record and produce the technical ¶2 declaration, please notify me by e-mail and file the corrected documents on the docket by the deadlines above; otherwise the motions and sanctions filings will be served and filed on the schedule described.

Regards,

Adam E. Kobs, Pro Se
Plaintiff in Kobs v. Sheltering Silverton et al., No. 25CV57849
adamkamazon1@gmail.com | 503-580-4776

CONFIDENTIALITY NOTICE: This email and any files transmitted with it are confidential, may be protected by legal privilege, and are intended solely for the use of the individual or entity to whom they are addressed. If you are not the intended recipient, you are hereby notified that any use, dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this email in error, please notify the sender immediately and delete it from your system.

12 attachments

CCTV and ESI Signed Order.PDF
99K

POS Sheriff the Shelter-1.pdf
25K

Email Sent for CCTV Order Signed.pdf
326K

Mtn to Dissolve Ord.pdf
182K

Order Mtn to Dissolve.pdf
139K

Decl of Guy Keating ISO Mtn to Diss Preservation Order (2).pdf
236K

Declaration of Sarah White ISO Mtn to Dissolve Preservation Order.pdf
185K

Def's Reply to Pltf's Opposition to Def's MTD.pdf
197K

Motion to Leave to File Sur Reply PDF Ex.pdf
459K

Motion to Strike Reply PDF Ex.pdf
460K

Motion to Compel CCTV PDF Ex.pdf
462K

Motion for Sanctions CCTV PDF Ex.pdf
539K

448

449

450 **Exhibit G**

451 "Amended" Declaration of Guy Keating (filed Dec 23, 2025)

12/23/2025 11:21 AM
25CV57849

IN THE CIRCUIT COURT OF THE STATE OF OREGON

FOR THE COUNTY OF MARION

ADAM EUGENE KOBS, an individual, and N.K., a minor, by and through his father and natural guardian, Plaintiff, v. SILVERTON SHELTERING SERVICES d.b.a. SHELTERING SILVERTON, an Oregon nonprofit corporation; SARAH WHITE, an individual; JOSEPH SCHAMUS, an individual; JORDAN SIMS, an individual; and TRAVIS DEAN GLIDDEN, an individual, Defendants.	Case No. 25CV57849 **AMENDED DECLARATION OF GUY KEATING IN SUPPORT OF MOTION TO DISSOLVE OR MODIFY PRESERVATION ORDER**

I, Guy Keating, hereby declare under penalty of perjury as follows:

1. I am the trial attorney for defendants Silverton Sheltering Services, Sarah White, and Joseph Schamus in this matter.
2. This declaration is based on my personal knowledge, and I am competent to testify to the matters contained herein.
3. I was never served by plaintiff with the Preservation Order.
4. Plaintiff has never attempted to confer with me about the Preservation Order.

///

///

///

SCHULTE, ANDERSON, DOWNES, ARONSON & BITTNER P.C.
811 SOUTHWEST NAITO PARKWAY, SUITE 500
PORTLAND, OREGON 97204-3379
TELEPHONE (503) 223-4131
FAX (503) 223-1346

I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

Dated this 23rd day of December, 2025.

/s/ Guy Keating
Guy Keating

SCHULTE, ANDERSON, DOWNES, ARONSON & BITTNER P.C.
811 SOUTHWEST NAITO PARKWAY, SUITE 500
PORTLAND, OREGON 97204-3379
TELEPHONE (503) 223-4131
FAX (503) 223-1346

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing **AMENDED DECLARATION OF GUY KEATING IN SUPPORT OF MOTION TO DISSOLVE OR MODIFY PRESERVATION ORDER** on the date indicated below and to the party/attorney(s) indicated below:

☐ Courtesy mail with postage prepaid, deposited in the US mail at Portland, Oregon; I further certify that said copy was placed in a sealed envelope delivered to attorneys at the addresses listed below.

☒ OJD Efiling System (File & Serve) (i.e., "Electronic service" means the electronic transmission of a notice of filing by the electronic filing system to the electronic mail (email) address of a party who has consented to electronic service under UTCR 21.100(1)).

☒ Via Email.

Adam Kobs
Adamkamazon1@gmail.com
Plaintiff Pro Se

DATED: December 23, 2025

/s/ Guy Keating
Guy E. Keating, OSB No. 074367
gkeating@schulte-law.com
Of Attorneys for Defendants

SCHULTE, ANDERSON, DOWNES, ARONSON & BITTNER P.C.
811 SOUTHWEST NAITO PARKWAY, SUITE 500
PORTLAND, OREGON 97204-3379
TELEPHONE (503) 223-4131
FAX (503) 223-1346

Exhibit H

Amended Declaration of Sarah White (filed Dec 23, 2025)

12/23/2025 11:21 AM
25CV57849

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MARION

ADAM EUGENE KOBS, an individual, and N.K., a minor, by and through his father and natural guardian,

Plaintiff,

v.

SILVERTON SHELTERING SERVICES d.b.a. SHELTERING SILVERTON, an Oregon nonprofit corporation; SARAH WHITE, an individual; JOSEPH SCHAMUS, an individual; JORDAN SIMS, an individual; and TRAVIS DEAN GLIDDEN, an individual,

Defendants.

Case No. 25CV57849

AMENDED DECLARATION OF SARAH WHITE IN SUPPORT OF MOTION TO DISSOLVE OR MODIFY PRESERVATION ORDER

I, Sarah White, hereby declare under penalty of perjury as follows:

1. I am the executive director of Sheltering Silverton.
2. This declaration is based on my personal knowledge, and I am competent to testify to the matters contained herein.
3. I was served with the Preservation Order on 25 November, 2025.
4. I was mistaken in my previous Declaration in Support of Motion to Dissolve of Modify Preservation Order. After plaintiff sent counsel for Sheltering Silverton a Sheriff's Return of Service, I reviewed the documents served on me and found that I had received plaintiff's Motion for Preservation Order. I was not aware when I signed the original declaration that it was in my possession.

SCHULTE, ANDERSON, DOWNES, AKRONSON & BITTNER P.C.
811 SOUTHWEST NAITO PARKWAY, SUITE 500
PORTLAND, OREGON 97204-3379
TELEPHONE (503) 223-4131
FAX (503) 223-1346

5. I did not intend to mislead the Court or to delay the proceedings. I merely made an oversight.

6. Plaintiff never attempted to confer with me about the Preservation Order.

7. All of the footage that plaintiff has requested in relation to this matter was automatically deleted before plaintiff filed this suit and cannot be recovered.

I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

Dated this 23rd day of December, 2025.

By: _____
Sarah White

SCHULTE, ANDERSON, DOWNES, ARONSON & BITTNER P.C.
811 SOUTHWEST NAITO PARKWAY, SUITE 500
PORTLAND, OREGON 97204-3379
TELEPHONE (503) 223-4131
FAX (503) 223-1346

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing **AMENDED DECLARATION** on the date indicated below and to the party/attorney(s) indicated below:

☐ Courtesy mail with postage prepaid, deposited in the US mail at Portland, Oregon; I further certify that said copy was placed in a sealed envelope delivered to attorneys at the addresses listed below.

☒ OJD Efiling System (File & Serve) (i.e., "Electronic service" means the electronic transmission of a notice of filing by the electronic filing system to the electronic mail (email) address of a party who has consented to electronic service under UTCR 21.100(1)).

☒ Via Email.

Adam Kobs
Adamkamazon1@gmail.com
Plaintiff Pro Se

DATED: December 23, 2025

/s/ Guy Keating
Guy E. Keating, OSB No. 074367
gkeating@schulte-law.com
Of Attorneys for Defendants

SCHULTE, ANDERSON, DOWNES, ARONSON & BITTNER P.C.
811 SOUTHWEST NAITO PARKWAY, SUITE 500
PORTLAND, OREGON 97204-3379
TELEPHONE (503) 223-4131
FAX (503) 223-1346

Exhibit I

Defendants' "Amended" Motion to Dissolve (filed Dec 23, 2025)

12/23/2025 11:21 AM
25CV57849

IN THE CIRCUIT COURT OF THE STATE OF OREGON

FOR THE COUNTY OF MARION

ADAM EUGENE KOBS, an individual, and N.K., a minor, by and through his father and natural guardian, Plaintiff, v. SILVERTON SHELTERING SERVICES d.b.a. SHELTERING SILVERTON, an Oregon nonprofit corporation; SARAH WHITE, an individual; JOSEPH SCHAMUS, an individual; JORDAN SIMS, an individual; and TRAVIS DEAN GLIDDEN, an individual, Defendants.	Case No. 25CV57849 **DEFENDANT SHELTERING SILVERTON'S AMENDED MOTION TO DISSOLVE OR MODIFY PRESERVATION ORDER**

MOTION

Pursuant to ORCP 71 A and ORCP 79 B(4), defendant Sheltering Silverton moves the Court to dissolve the Preservation Order. In the alternative, defendant respectfully requests the Court modify its Preservation Order. Plaintiff did not serve counsel for Sheltering Silverton with the Preservation Order or confer with counsel about it before it was signed by the Court. Plaintiff has not met the requirements of ORCP 79 and is not entitled to a temporary restraining order ("TRO") or preliminary injunction. Additionally, the Order is unduly burdensome and as such defendant Sheltering Silverton should not be required to abide by the schedule set out in the Order pursuant to ORCP 36 C. This Motion is supported by the Declaration of Guy Keating and Amended Declaration of Sarah White filed herewith.

SCHULTE, ANDERSON, DOWNES, ARONSON & BITTNER P.C.
811 SOUTHWEST NAITO PARKWAY, SUITE 500
PORTLAND, OREGON 97204-3379
TELEPHONE (503) 223-4131
FAX (503) 223-1346

ARGUMENT

1. *Plaintiff has not provided notice of the temporary restraining order required by ORCP 79* B(1)(b).

Pursuant to ORCP 79 B(1)(b), the applicant must submit an affidavit or declaration to the Court setting forth the efforts, if any, which have been made to notify the defendant or defendant's attorney of the application, and the reasons supporting the claim that notice should not be required. ORCP 79 B(1)(b). Counsel for Sheltering Silverton has not received any notice of the Order from plaintiff, nor has plaintiff attempted to confer on the substance of the Order. *Decl. of Guy Keating.* Sarah White received service of the Order on November 25, 2025. *Decl. of Sarah White.* Plaintiff has not attempted to confer with Sarah White on the substance of the Order. *Decl. of Sarah White.* Because plaintiff did not make reasonable efforts to notify defendant's counsel of the application for the TRO, the Court should dissolve the Order.

2. *Plaintiff has not satisfied the requirements of for the Court to grant him a temporary restraining order or preliminary injunction.*

Plaintiff has not shown good cause that there is a risk that relevant ESI in defendant's possession is at risk of being deleted. ORCP 79 provides for temporary restraining orders and preliminary injunctions, and this order is neither. Only a TRO may be granted ex parte without oral or written notice to the adverse party. ORCP 79 B(1). No Preliminary injunction may be issued without notice to the adverse party at least five days before the time specified for the hearing. ORCP 79 C(1).

The Court may only grant a TRO if it appears from specific facts shown by an affidavit, a declaration or a verified complaint that immediate and irreparable injury, loss, or damage will result to the applicant before the adverse party or the adverse party's attorney can be heard in opposition. Here, plaintiff has not shown that irreparable injury or loss will result from the non-retention of ESI. Indeed, the ESI which plaintiff is not in the possession custody or control of

SCHULTE, ANDERSON, DOWNES, ARONSON & BITTNER P.C.
811 SOUTHWEST NAITO PARKWAY, SUITE 500
PORTLAND, OREGON 97204-3379
TELEPHONE (503) 223-4131
FAX (503) 223-1346

Sheltering Silverton, as Sheltering Silverton's video system does not retain video for more than a few days. *Decl. of Sarah White.*

3. *Defendant Sheltering Silverton is unduly burdened by the Order, and the Order is inapposite in light of defendant's motion to dismiss filed herewith.*

Defendant requests, in the alternative, that the Court modify the order. Defendant filed its Motion to Dismiss on December 9, 2025. The schedule set forth in the Preservation Order is inapposite because the Court should first hear whether or not plaintiff's claims should be dismissed in their entirety. Pursuant to ORCP 36 C(1), defendant should not be required to undergo burdensome discovery for a case that may not survive a motion to dismiss.

Specifically, defendant requests that Sections 2 and 4 be struck from the Order. Nowhere in ORCP 79 does a TRO entitle the moving party to expedited discovery. 14 days is an insufficient time to require defendant to compile the necessary information regarding all of the requested CCTV and recording information. The Order's requirement that the parties meet within 21 days and submit ESI protocols or competing proposals is also unduly burdensome as it requires that an unknown amount of data be preserved by defendant. Defendant requests that if the Court determines not to dissolve the order, sections 2 and 4 be struck.

///

///

///

///

///

///

///

///

///

SCHULTE, ANDERSON, DOWNES, ARONSON & BITTNER P.C.
811 SOUTHWEST NAITO PARKWAY, SUITE 500
PORTLAND, OREGON 97204-3379
TELEPHONE (503) 223-4131
FAX (503) 223-1346

CONCLUSION

For the foregoing reasons, defendant requests that the Preservation Order be dissolved. In the alternative, sections 2 and 4 of the Order should be struck.

Dated this 23rd day of December, 2025.

SCHULTE, ANDERSON, DOWNES, ARONSON & BITTNER P.C.

By: */s/ Guy Keating*
Guy E. Keating, OSB No. 074367
811 SW Naito Parkway, Suite 500
Portland, OR 97204
(503) 223-4131 / (503) 223-1346 fax
gkeating@schulte-law.com
Attorney for Defendants

By: */s/ Tyler Honn*
Tyler C. Honn, OSB No. 252499
811 SW Naito Parkway, Suite 500
Portland, OR 97204
(503) 223-4131 / (503) 223-1346 fax
thonn@schulte-law.com
Attorney for Defendants

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing **DEFENDANT SHELTERING SILVERTON'S AMENDED MOTION TO DISSOLVE OR MODIFY PRESERVATION ORDER** on the date indicated below and to the party/attorney(s) indicated below:

☐ Courtesy mail with postage prepaid, deposited in the US mail at Portland, Oregon; I further certify that said copy was placed in a sealed envelope delivered to attorneys at the addresses listed below.

☒ OJD Efiling System (File & Serve) (i.e., "Electronic service" means the electronic transmission of a notice of filing by the electronic filing system to the electronic mail (email) address of a party who has consented to electronic service under UTCR 21.100(1)).

☒ Via Email.

Adam Kobs
Adamkamazon1@gmail.com
Plaintiff Pro Se

DATED: December 23, 2025

/s/ Guy Keating
Guy E. Keating, OSB No. 074367
gkeating@schulte-law.com
Of Attorneys for Defendants

SCHULTE, ANDERSON, DOWNES, ARONSON & BITTNER P.C.
811 SOUTHWEST NAITO PARKWAY, SUITE 500
PORTLAND, OREGON 97204-3379
TELEPHONE (503) 223-4131
FAX (503) 223-1346

Exhibit J

July 28th, 2025 Email to Operations Director Megan Smith Regarding Video Evidence and Emotional Distress

Gmail **Adam K <adamkamazon1@gmail.com>**

Request for documents and reminder of agreement

8 messages

Megan Smith <megan@shelteringsilverton.org> Mon, Jul 28, 2025 at 3:05 PM
To: adamkamazon1@gmail.com
Cc: MaryJane Schaffer <president@shelteringsilverton.org>, Sarah White <sarah@shelteringsilverton.org>, Kate Allen-Farris <kate@shelteringsilverton.org>

Hello Adam,

Sarah has made me aware of your request for your initial intake and agreement, and also of the warning letter you were sent (dated 7/15) stating you violated the mutual respect agreement for the Rapid Rehousing program.

As Operations Director, I am stepping in to provide you with the documents you requested and further clarification about the warning you received.

First, would you prefer to have those documents emailed to you or mailed?

Second, you have emailed communication containing abusive language to Sarah since you received the warning letter. I am aware that you followed up with an apology. I am giving you a second warning that you violated the mutual respect policy and informing you of our expectations from going forward.

- You will not use abusive or threatening language in any communication with staff of Sheltering Silverton.
- You will not come to the shelter property until informed otherwise. If you wish to meet with your housing case manager (Kate), you will make arrangements via email or phone with her and do so off site.
- If you wish to continue receiving Rapid Rehousing services, you will complete your recertification paperwork that Kate has sent to you and arrange to return it to her no later than **August 4**. **Please email or me to make arrangements.**
- You will abide by all terms of your AHOP program agreements and your lease.
- You will refrain from discussing with our staff the services we provide to other clients or guests in our shelter.

If you do not abide by these expectations, we may send a notice to terminate your services from the Rapid Rehousing program.

Please respond to this email with an answer about how you would like to receive the documents you requested and confirm you will abide by the expectations listed above.

Sincerely,

--
Megan Smith
Operations Director
Sheltering Silverton

Sheltering
SILVERTON

Adam K <adamkamazon1@gmail.com> Mon, Jul 28, 2025 at 5:02 PM
To: Megan Smith <megan@shelteringsilverton.org>
Cc: MaryJane Schaffer <president@shelteringsilverton.org>, Sarah White <sarah@shelteringsilverton.org>, Kate Allen-Farris <kate@shelteringsilverton.org>

Ms. Smith,

Thank you. I understand your concern about my intense language towards Sarah and anyone else. Again, I apologize. I have no ill intent other than to make strong and vital points. At times, it may have been too intense, but it probably is a part of my mental healing process to let it all out. My repetitiveness with my emails, and why so many emails, is because I never receive responses to my specific concerns, and proof of my misconduct (before this incident broke out on July 4th). I simply am just encouraged by the shelter to seek mental help. That, to me, isn't taking responsibility to fulfill what I am simply asking for - and that is direct responses to what I am concerned with. Then, naturally, I develop a lack of trust. You have to understand my temperament at this time, as I feel violated mentally and historically threatened by two men physically, when it was all unnecessary. It almost placed me in the position of having to go on Trial in Marion County Court for the defense of my own body when I simply asked Travis why he was speaking of rape and murder. I asked Sarah if she has recorded video of this event from 2024, and she responded with (paraphrased) "what is the point" and "no, we don't have video that far back." I ask, is there a requirement for your organization to have a certain amount of recorded video? Or is it completely at your discretion how much video is kept? This would have been a 2 versus 1 fight, and I have no idea what would have happened, and how long the fight would have continued. Perhaps even the whole shelter would have started brawling, who knows? Fights tend to multiply. There is a dependency on staff (and Greg specifically during the normal work day) to stop

all physical fights (as far as I know). Well, Greg wasn't around during this incident in 2024. So, what do I do? I was told by Joseph (If memory serves) that we are not allowed to dial 911, because we are on Sheltering Silverton's private property. Kenny Wilson also informed me of the shelter's position on how management basically has no trust for law enforcement to make threat level decisions when they arrive at the scene. This is not a lawful position for any organization to have. Correct? I have to also carefully consider the safety of my son, Nolan Kobs, whom I would give my life for. How can I assess what level of mental illness (or child perverse tendencies or murderous intent) I am up against, when I know nothing of anyone's history? Travis' invention of a son that he never had and using foul words like rape and murder, that led me down a rabbit hole of my own personal investigation, and reaction to what I found, all boils down to an individual whom should know (subconsciously at least) he needs mental help/theraputic treatment to stop being offensive in public. Travis (if I recall what Silverton PD said correctly) has over 100 calls from the community of Silverton saying these words and phrases that led us all to believe he intends to harm, or not report harm, or even question if there is harm at all. The least common denominator in all this, is that, quite honestly, if there is even the **possibility** of harm, it needs to be reported to authorities and paid close attention to. This long tumultuous history between Travis and Siniva is making logical sense now, and it now also makes sense why Sarah never mentioned any progress with Travis, as he never committed himself to treatment (as far as I was made aware of). My focus on Travis, I will admit, was because he was obviously romantically invested with MJ (and she in him), and I felt that the dishonesty from Travis would continue and she was in mortal danger (at least mentally). Sure enough, MJ admitted to me that Travis lied and said "Adam was a part of a group of people that conspired against me, and led me to my demise" (something like that). So, I acted out, and did what I felt was in my heart. I exposed him for his lies, and that was all. My investigation of him scared me to death, and I warned everyone.

I never acted perfectly at the shelter, during my stay and visits, but I was also of the general feeling that I was par level compliance. Everyone's progress is different, I am well aware, but I personally draw the line on perverseness and confusion around top level societal offenses (such as rape and murder). Both of those offenses are punishable for potentially the rest of an adult's life. You also have to understand, I personally had to stand up to felony charges and make the horrible decision to go to Trial or not, in Washington County Court in 2020. If you have never experienced this, and never been held in jail, you don't really understand the level of suffering that is inflicted. Especially, if you know you are innocent, with actual proof. I (and Mary), often get criticized on our guilty plea deal acceptance on our case, however, others that are non-experienced don't understand the unfairness in the law system. This is precisely why I decided finally to focus on post conviction relief as I have found (and through legal consultation) evidence of innocence that was overlooked and purposely ignored. I only bring my experience up to illustrate why I intensely was offended by advocating for the shelter as to why Travis was consistently speaking of murder and rape. On top of this, I am conscious of police investigation after a fight, potentially being reported incorrectly, and then myself being put on Trial **again**. This time, probably for the rest of my adult life (if the fight got too intense) if convicted. All while, I really don't intend to be involved in the lives of people I sleep next to (except for positive and healthy personal counseling). I generally understand the risks of a shelter, I just think that the line is too blurred as to how much risk is actually at present. For instance, I am not even clear on if registered sex offenders are allowed in the shelter or not. It is never discussed. Whispers float around about certain individuals, and it sticks in the back of everyone's mind. Clients feel we "cross the line" if we personally look into the rumors. It's very frustrating. I mentioned to Sarah that Mary would have filed yet another DHS investigation on me for my unawareness of the situation with Travis (or anyone else) in relation to Nolan. Mary assumed already that drug usage was present, even though I explained to her previously that drug usage was prohibited on shelter grounds. In the back of my mind, I always recall the incident with Sandy when I handed over a big bag of meth to Megan (I believe because it was white powder) and the two knives that were laying on her bed. So, essentially, I had to lie to my ex-wife to preserve my ability to have my lawful (and crucial) visitations with Nolan. I had to also rest unassured about exactly what to report to Mary about physical safety. I am simply just trying to be a Dad, stay out of jail, end my homelessness, help others when I can, find a romantic interest, develop a network of family and friends, and get employed when the odds are totally against me because of my felonies. I am also on a spiritual journey, and I am also trying to demonstrate to my biological family that I am worthy of their love again. My interest in MJ was pure, and I knew would be overly-analyzed by the shelter. For instance, why did Sarah approach me and say, "we're watching ya" (in reference to my one outing with MJ on July 3rd). Essentially, why did I deserve to be chased off of her?

See, when I don't receive direct responses with some sort of evidence, it's aggravating.

Do you understand, from my perspective, why this was so confusing, exhausting, and alarming? I brought Nolan to the shelter because it is my "home base" where the bathrooms, food, games, people, drinks, tables, etc. are, and not always available in public areas. I often get criticized for bringing Nolan to the shelter, but then I beg the question, shouldn't it be the same level of threat that you would encounter in a social services facility? Again, I'm perplexed. Remember, too, that I do not possess a vehicle (outside of my will and control), and Nolan literally cries on our walks sometimes because he hates walking long distances. I don't blame him at all. This too, is why I centered him at the shelter, so he didn't have to walk to say, the city center kids park. At the end of the day, it is a catch 22 for me (damned if I do, damned if I don't) , and I didn't want to transfer to a family shelter in Salem. Sheltering Silverton, overall, I feel is the best sheltering experience in the state of Oregon, as far as I can tell. I didn't want to sacrifice that either, just to be an active Dad.

If anyone could start addressing my personal concerns and questions presented in multiple emails, I can start the calming process in my mind and begin my therapy to return to my normal self. I feel that Salem is a triggering and dangerous place, as per my experience, and I do not wish to return there if I am forced to return to shelter level living. I don't plan to go backwards in life, but I cannot predict the future. Please help me understand these concerns I have, rather than deferring me repeatedly to professional mental help. Silverton PD is siding with me on my concerns, and that tells me that I'm not bringing up insignificant issues. Please help me understand. Also, this isn't just my personal concern, I believe it is the concern of many clients as well.

Thank you,

Adam Kobs

[Quoted text hidden]

Adam K <adamkamazon1@gmail.com> Mon, Jul 28, 2025 at 6:20 PM
To: Megan Smith <megan@shelteringsilverton.org>
Cc: MaryJane Schaffer <president@shelteringsilverton.org>, Sarah White <sarah@shelteringsilverton.org>, Kate Allen-Farris <kate@shelteringsilverton.org>

Ms. Smith,

I missed your request in your last sentence. I prefer the documents be sent to me in legible scanned PDF format, and emailed. Thank you.

In response to the second portion, please specifically address and give me answers at least to the questions about top level safety, threat level perception from client perspective, why deescalation methods are never discussed to clients, 911 protocols, weapons (those that are disguised as "tools" for example), disciplinary actions, mental violation response (such as when a person says, "I'm going to burn down the shelter") like Jordan Sims was often saying when he exploded last year, expectations around drugs on site, these type of issues. If no response to my concerns are given, then I wonder why? As a protectionary male (and I share this trait with many other males), when another individual even verbally/physically threatens violence or mental attack, it stimulates my physical response, and is horribly challenging at times of intensity to be restrained and be law abiding and shelter rule abiding at the same time. Imagine, if I assaulted Jordan Sims and Travis Glidden, that day, out of anger, how that would have blown my entire chances for not only my housing, but my freedom itself! Yikes!

Yes, I will comply with your expectations. I also hope for the ability to address my concerns at the management level, so as to avoid disruption with the clients themselves. But, when I don't feel satisfied (or even acknowledged) with my answers, what am I supposed to do? Please help me understand this.

Thank you,

Adam Kobs

On Mon, Jul 28, 2025 at 3:05 PM Megan Smith <megan@shelteringsilverton.org> wrote:
[Quoted text hidden]

Megan Smith <megan@shelteringsilverton.org> Tue, Jul 29, 2025 at 12:34 PM
To: Adam K <adamkamazon1@gmail.com>
Cc: MaryJane Schaffer <president@shelteringsilverton.org>, Sarah White <sarah@shelteringsilverton.org>, Kate Allen-Farris <kate@shelteringsilverton.org>

Adam,

Attached are the intake, original shelter agreement you signed when you entered services in 2023, and the most recent revised shelter agreement you signed in February, 2024.

I understand that you are concerned with safety at the shelter. While we take the safety of shelter guests seriously, we will not be providing details about our safety practices to you. We do not have any record of an incident reported by you during your stay here. Both you and your son (when he visited, he was under your supervision) were safe during your stay, which ended 11 months ago. I am glad that now you are in your own apartment. I hope you will focus on maintaining your housing, your stability and your health.

As for your perception of unfair treatment, I appreciate it can be difficult to understand why decisions are made in a low barrier emergency shelter. We uphold confidentiality and privacy for each client. As I stated in my last email, the expectation we are holding with you is that we will not discuss the services provided to other clients or guests. I understand that this boundary may not be satisfactory, but it is your responsibility to respect it.

You were informed of the reasons you are being asked not to visit the shelter, and we are upholding that decision for the time being. You may submit a dispute resolution request if you are seeking to resolve that specific decision, and I have attached the dispute resolution form. If you choose to do so, please limit your request to yourself, the services you are requesting, and your goals going forward.

Finally, as liaison for our Rapid Rehousing with Community Action agency (who runs the program), I have decided it is in the best interest of all parties that your ongoing assistance be coordinated directly with the team at Community Action. They will provide you with all program documentation, recertification, and ongoing case management. Kate will transfer your case to them and you will have a case manager on their team to meet with. This will help you avoid any potential conflict with the staff or other clients at Sheltering Silverton. I will send you an email introducing you to their team later today.

Sincerely,
Megan Smith
[Quoted text hidden]

4 attachments

- **Dispute Resolution Form.docx.pdf** 174K
- **Agreement 2024 AK.pdf** 5773K
- **Shelter Agreement AK.pdf** 4888K
- **Intake AK.pdf** 14524K

Adam K <adamkamazon1@gmail.com> Tue, Jul 29, 2025 at 1:57 PM
To: Megan Smith <megan@shelteringsilverton.org>
Cc: MaryJane Schaffer <president@shelteringsilverton.org>, Sarah White <sarah@shelteringsilverton.org>, Kate Allen-Farris <kate@shelteringsilverton.org>

475

Ms. Smith,

Thank you. It appears everyone's emotions towards me have calmed down, which is good. I myself am much more calm.

Please read this with my intent to simply discuss some facts that remain unanswered, not as any type of threat or ill intent. If you are redirecting my further concerns through a dispute resolution process, then I will do so (and please disregard the rest of the body of this email). Otherwise, please specifically address these crucial points below.

1) You claim that there is no record of the incident whereby Travis Glidden was muttering statements about rape of a child (this happened multiple nights in 2024), and then stormed out of the building (at around possibly midnight), slammed the exit door as hard as he could, and then strafed by the entire building on his way off the property yelling something like "I'm going to kill you Siniva!!!" repeatedly. Siniva was coincidentally lodged in a cabin (if I recall correctly) across the main shelter building, and it is possible she heard his specific yelling. I also have eye witness September Murasaki, whom also told me that Travis was asking to get in her bed with her, when he was assigned next to her bed. I have discussed this incident with September personally (as I am legally allowed to do so, and I see no violation of the client agreement for discussing this), and she recounts the multiple incidents with Travis very specifically. September is a non-drug using individual and has moral integrity to give the truth, so she is credible. This is in fact a corroboration of the claim that this incident did occur, despite the limitations of your surveillance system historical archives. Lastly, Joseph, the front desk attendant, also was a direct eye witness, and if he claims to not remember the incident, I highly question this. He was directly responsible for recording the incident thoroughly, and it appears he failed to do so. Also, as I recall, September and I possibly followed up with Joseph and/or Greg, and we noticed a lack of recording the incident by Joseph, or, possibly, that the incident was marginalized as "Travis had another episode", something like that. I have a very sharp and photographic memory of specific significant events, and this was one of them.

Also, I will attach the Messenger conversation that I had with Sarah, that points out a specific night (with date) where I was up all night worried about this situation with Travis. If memory serves me, it was the following morning when I confronted Travis, while sitting in the chair next to the front desk. When Travis freaked out, and continued his narrative about the rape of his son, Jordan rushed over, and stared me down for at least 1 minute. You have to understand that this body language is a direct challenge to a fight, which I did not participate in. I remember, Greg, Megan, Sarah, Elyse, specifically ran out to see what the yelling was all about. Megan, the accountant, in particular, asked me personally "Adam, are you doing OK?" Me, saying, "No Megan, I'm not OK." Sarah pulled me into her office immediately after, and we discussed this. She said, "Adam, I see that you're at your boiling point, what can I do?" I replied, "Sarah, at this point, either I go, or Travis goes." Sarah replied, paraphrased, "Adam, don't worry, we will work on Travis. I got your back. Don't worry, I will handle this." After this meeting, Sarah did not keep me informed of any progress or did not even explain if Travis was working on his issues, especially the raping of his son, by his family. I tried so hard to stay away from Travis, and not enter my mind into his turmoil. I genuinely trusted Sarah was doing something drastic to help Travis and this alleged son. I was genuinely concerned about Siniva's safety as well. This is where I will end my conversation about this.

The screenshots attached will show that I contacted Sarah on August 19, 2024 about a concern about Travis. This is within the 1 year timeframe that Sarah also told me, that the video surveillance is being kept at the shelter.

Do you wish to revise your statement about there being no record of the two incidents? Travis causing panic, slamming the door, and yelling about murder, and, one morning where it was a yelling match between me and Jordan and Travis (teaming together).

2) I reviewed my initial intake form. I am surprised to see that there was no section where I voluntarily disclosed my public offenses. However, I remember specifically how my intake process happened. Junior (aka Guillermo, pardon if I misspelled), checked me in early that night on 10/31/2023, and I did a partial application. The following day, if memory serves, David Goldblatt followed up with the rest of the application and had me complete it. Somehow, through some process, David became aware of my felonies. He required me to discuss them openly. He specifically asked me (upon knowing they were theft felonies), "Adam, you didn't knock down a convenience store, and rob them, did you?" I said, "No, this was a family dispute related to my Father-in-law and his Estate." David said, "OK, that's fine, your application is being reviewed." What am I generally missing here? Did David simply ask me if I had any offenses? I know he is no longer employed at the shelter, but, this is what I recall. Please help me understand.

3) I am still troubled by the shelter's position on clients being allowed to dial 911 if they feel in any danger. Am I correct in saying, the shelter often discourages dialing 911, but does not prohibit it? I hope, in fact, there will never be, any repercussion if a client decides to override your deescalation process and contact Silverton PD directly. Please explain.

Once more, if I must go through the dispute resolution process, I will consider doing so.

Thank you,

Adam Kobs

[Quoted text hidden]

3 attachments

Screenshot_20250729_135125_Messenger.jpg
339K

Screenshot_20250729_135125_Messenger.jpg
339K

Screenshot_20250729_135110_Messenger.jpg
408K

Adam K <adamkamazon1@gmail.com> Tue, Jul 29, 2025 at 2:02 PM
To: Megan Smith <megan@shelteringsilverton.org>
Cc: MaryJane Schaffer <president@shelteringsilverton.org>, Sarah White <sarah@shelteringsilverton.org>, Kate Allen-Farris <kate@shelteringsilverton.org>

All,

I made a mistake and doubled up on a screenshot. Here is the third screenshot.

Thanks,

Adam Kobs
[Quoted text hidden]

Screenshot_20250729_135138_Messenger.jpg
435K

Adam K <adamkamazon1@gmail.com> Sun, Aug 3, 2025 at 8:32 PM
To: Megan Smith <megan@shelteringsilverton.org>, Kaela Lombardi <kaela.lombardi@mwvcaa.org>
Cc: MaryJane Schaffer <president@shelteringsilverton.org>, Sarah White <sarah@shelteringsilverton.org>, Kate Allen-Farris <kate@shelteringsilverton.org>

Ms. Smith,

I have taken a few days to find closure and have decided to partake in a final legal and practical discussion with you. I have included Kalea in this conversation, because I want her awareness and possible input. This email is not intended to be a threat or slander of any kind to anyone, it's meant to "tie the bow" on my departure.

I will state some facts:

1) I am not allowed on shelter property until further notice

2) All services, all of them, including all case management is now and will no longer be offered to me, permanently

3) Ms. Smith required that I adhere to the following rules:

- You will not use abusive or threatening language in any communication with staff of Sheltering Silverton.
- You will not come to the shelter property until informed otherwise. If you wish to meet with your housing case manager (Kate), you will make arrangements via email or phone with her and do so off site.

Exhibit J - Page 5 of 6

477

- If you wish to continue receiving Rapid Rehousing services, you will complete your recertification paperwork that Kate has sent to you and arrange to return it to her no later than **August 4**. **Please email or me to make arrangements.**
- You will abide by all terms of your AHOP program agreements and your lease.
- You will refrain from discussing with our staff the services we provide to other clients or guests in our shelter.

Interestingly enough, my professional life pivoted from being a professional Corporate Accountant to now a Lawyer, in order to reverse the damage I self-inflicted upon my life. More often now, I am called to become a legal expert and defend my own case. Legal services for the poor, in this country, are an absolute joke. This being said, I am summarizing all actions taken against me (two warnings that directly threaten my housing, my life, and my Fatherhood) for offenses, basically stated in criminal charge form, but lacking the "discovery" that prosecution is required in the court of law to provide (usually in written, not verbal, form).

All things considered, it is easy to determine both legally and practically, that my "Client" status has officially been terminated with Sheltering Silverton, as there is no longer going to be this community resource available to me. To exacerbate this, you have chosen to not respond to any of my primary concerns, even those that violate my rights as a United States citizen. Even if the privilege for me to enter the property would be restored, I have high doubts about my personal safety (and Nolan's safety) or exposure to extreme mental illness (such as sociopaths and psychopaths, and potentially child predators, or adult predators), and even violent offenders straight out of the prison systems. I too believe that people deserve a second chance, but all clients should have an awareness of what each other's history is, especially if they are committing the same crimes day-after-day. Respectfully, I do request that my Client status be permanently severed, and I wish to be a simple Silverton citizen with rights (in the future) to be a Visitor only.

I bring all this up because, arguably, that my "Client" status is now terminated, I am now simply just a citizen of the town of Silverton that happened to be a former client of Sheltering Silverton. Basically, a third warning, or even revocation would be an overstep of Sheltering Silverton's authority, and a violation of my rights. Am I correct? If not, then please explain why. It's not that I intend to go against what you have requested, I simply feel that you have no legal authority over me anymore, in regards to my Rapid Rehousing, as you have chosen to exit me completely.

Lastly, and respectfully, please remove all my pictures from your Facebook group, and remove any and all my personal quotations and my personal pictures from your inventory. I wish to erase this memory completely, and chalk this up as a bitter sweet experience. Hopefully, if homelessness were a part of my fate in the future, we can reevaluate my need for services, and sign a fresh Client Agreement again. The likelihood of me returning to homelessness is small.

Please acknowledge and respond. A non-response is also a response in and of itself, please be mindful.

Thank you,

Adam Kobs
[Quoted text hidden]

Megan Smith <megan@shelteringsilverton.org> Mon, Aug 4, 2025 at 12:09 PM
To: Adam K <adamkamazon1@gmail.com>
Cc: Kaela Lombardi <kaela.lombardi@mwvcaa.org>, MaryJane Schaffer <president@shelteringsilverton.org>, Sarah White <sarah@shelteringsilverton.org>, Kate Allen-Farris <kate@shelteringsilverton.org>

Hi Adam,

I am acknowledging your email.

We will respect your request to revoke permission to use any photos with you or quotes from you.

Best wishes,

Megan
[Quoted text hidden]

Exhibit K

Email to Sarah White Dated August 19th, 2024 Regarding Travis Glidden Concerns

Gmail **Adam K <adamkamazon1@gmail.com>**

Travis
4 messages

Adam K <adamkamazon1@gmail.com> Mon, Aug 19, 2024 at 2:05 AM
To: Sarah White <sarah@shelteringsilverton.org>

Hello Sarah,

I would like to speak to you about Travis. After tonight's psychotic episode (at approx 1:40am), and continued displays of inner violent psychotic episodes from the past, I have decided to seek another shelter if Travis is continued to be lodged here.

I fear for the safety and security of myself and my son and I won't tolerate Travis' behavior any longer. The man is a trained marine with a capacity to grab a weapon and start killing people. We keep forgiving his psychotic episodes, but I will not tolerate it any more.

Thanks
Adam Kobs

Sarah White <sarah@shelteringsilverton.org> Mon, Aug 19, 2024 at 8:59 AM
To: Adam K <adamkamazon1@gmail.com>

I'm sorry that things were frightening last night. Because Travis is willing to leave when he has an episode, we cannot kick him out. I will talk with him again today about treatment options.
[Quoted text hidden]

Adam K <adamkamazon1@gmail.com> Mon, Aug 19, 2024 at 9:05 AM
To: Sarah White <sarah@shelteringsilverton.org>

Sarah,

I do not find this to be an acceptable answer. You won't even meet with me. I have been such a good client for you, and now you jeopardize my place of living. I had higher expectations for you.

Adam
[Quoted text hidden]

Sarah White <sarah@shelteringsilverton.org> Mon, Aug 19, 2024 at 9:08 AM
To: Adam K <adamkamazon1@gmail.com>

I never said I wouldn't meet with you.
[Quoted text hidden]